

# EXHIBIT F

State of South Carolina ) In the Court of Common Pleas  
 )  
 County of Hampton ) Case No: 2017-CP-25-00348

Jessica S. Cook, Corrin F. )  
 Bowers & Son, Cyril B. Rush, )  
 Jr., Bobby Bostick, Kyle Cook,) )  
 Donna Jenkins, Chris Kolbe, )  
 and Ruth Ann Keffer, on behalf )  
 of themselves and all other )  
 similarly situated, )

Plaintiff(s), )

Deposition

vs. )

of

JIMMY ADDISON

South Carolina Public Service )  
 Authority, an Agency of the )  
 State of South Carolina (also )  
 known as Santee Cooper); W. )  
 Leighton Lord, III, in his )  
 capacity as chairman and )  
 director of the South Carolina )  
 Public Service Authority; )  
 William A. Finn, in his )  
 capacity as director of the )  
 South Carolina Public Service )  
 Authority; Barry Wynn, in his )  
 capacity as director of the )  
 South Carolina Public Service )  
 Authority; Kristofer Clark, in )  
 his capacity as director of )  
 the South Carolina Public )  
 Service Authority; Merrell W. )  
 Floyd, in his capacity as )  
 director of the South Carolina )  
 Public Service Authority; J. )  
 Calhoun Land, IV, in his )  
 capacity as director of the )  
 South Carolina Public Service )  
 Authority; Stephen H. Mudge, )  
 in his capacity as director of )  
 the South Carolina Public )  
 Service Authority; Peggy H. )  
 Pinnell, in her capacity as )  
 director of the South Carolina )  
 Public Service Authority; Dan )  
 J. Ray, in his capacity as )

director of the South Carolina)  
Public Service Authority; )  
David F. Singleton, in his )  
capacity as director of the )  
South Carolina Public Service )  
Authority; Jack F. Wolfe, Jr., )  
in his capacity as director of )  
the South Carolina Public )  
Service Authority; Central )  
Electric Cooperative, Inc.; )  
Palmetto Electric Cooperative, )  
Inc.; South Carolina Electric )  
& Gas Company; and SCANA )  
Corporation, )  
)  
)  
Defendant(s). )  
\_\_\_\_\_ )

Deposition of JIMMY ADDISON, taken before Jennifer L. Thompson, CVR-M, Nationally Certified Verbatim Court Reporter and Notary Public in and for the State of South Carolina, scheduled for 10:00 a.m. and commencing at the hour of 10:04 a.m., Monday, November 4, 2019, at the office of Nelson Mullins, Charleston, South Carolina.

Reported by:

Jennifer L. Thompson, CVR-M

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1           been shut down. Isn't that correct?

2                   MR. CHALLY: [Objection]

3    A       On the advice of counsel, I decline to answer the  
4           question based on my Fifth Amendment rights under  
5           the Constitution.

6    Q       Isn't it true the executives were able to keep  
7           their jobs as a result of the continuance of the  
8           failed nuclear project?

9                   MR. CHALLY: [Objection]

10   A       On the advice of counsel, I decline to answer the  
11          question based on my Fifth Amendment rights under  
12          the Constitution.

13   Q       Please tell the jury if you are sorry for the  
14          billions of dollars that were wasted on the  
15          construction project at VC Summer Units 2 and 3?

16                  MR. CHALLY: [Objection]

17   A       On the advice of counsel, I decline to answer the  
18          question based on my Fifth Amendment rights under  
19          the Constitution.

20   Q       Isn't it true that you received millions of  
21          dollars in bonuses as this project failed?

22   A       On the advice of counsel, I decline to answer the  
23          question based on my Fifth Amendment rights under  
24          the Constitution.

25   Q       Isn't it true while you have received millions of

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1 could receive tax benefits, correct?

2 MR. CHALLY: [Objection]

3 A On the advice of counsel, I decline to answer the  
4 question based on my Fifth Amendment rights under  
5 the Constitution.

6 Q What was the amount of the tax benefits received  
7 by SCE&G for abandoning the project?

8 A On the advice of counsel, I decline to answer the  
9 question based on my Fifth Amendment rights under  
10 the Constitution.

11 Q When SCE&G decided to abandon the project, it knew  
12 that this would increase cost to Santee Cooper,  
13 correct?

14 MR. CHALLY: [Objection]

15 A On the advice of counsel, I decline to answer the  
16 question based on my Fifth Amendment rights under  
17 the Constitution.

18 Q SCE&G's decision to abandon the project meant that  
19 Santee Cooper would have to pay all of the costs  
20 to maintain and preserve the site, correct?

21 MR. CHALLY: [Objection]

22 A On the advice of counsel, I decline to answer the  
23 question based on my Fifth Amendment rights under  
24 the Constitution.

25 Q And you understand, sir, there are significant